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6 Attorneys for Defendant
 7 WALMART INC.

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

12 DEBORAH GALLEGOS, individually,
 13 Plaintiff,

14 vs.

15 WALMART, INC., foreign corporation; DOES
 16 I-X, and ROE CORPORATIONS I-X,
 17 inclusive,
 18 Defendants.

Case No.: 2:23-cv-00264-CDS-BNW
 Hon. Cristina D. Silva

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE DISCOVERY
 DEADLINES**

[FIRST REQUEST]

19 The parties, Plaintiff Deborah Gallegos (“Gallegos”), through her attorney Joseph W. Ricco
 20 of the law firm of Marathon Law Group, PLLC, and Defendant Walmart Inc. (“Walmart”), through
 21 their attorney Susan E. Gillespie of the law firm of Burger | Meyer LLP, (collectively the “Parties”),
 22 hereby stipulate as set forth hereinbelow, to extent the existing discovery deadlines 90 days and
 23 respectfully request that the Court enter an order under Local Rule IA 6-1 and Local Rule 26-3.

24 Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the first request to extend
 25 discovery deadlines in this matter.

26 **I. DISCOVERY COMPLETED**

- 27 1. Defendant served its Initial Rule 26 Disclosure on May 2, 2023.
- 28 2. Plaintiff served her initial Rule 26 Disclosure on May 5, 2023.

STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES

3. Defendant served one set of Interrogatories and Requests for Production upon Plaintiff on May 5, 2023. Plaintiff served her responses on June 27, 2023.

4. Defendant obtained executed authorizations from Plaintiff on June 27, 2023.

5. Plaintiff served their First Supplemental Rule 26 Disclosure on June 28, 2023.

II. REMAINING DISCOVERY

1. Subpoenaing and receiving records from Plaintiff's medical providers;

2. Deposition of Plaintiff;

3. Disclosure of Parties' expert and/or rebuttal expert witnesses;

4. Depositions of Parties' expert and/or rebuttal expert witnesses; and

5. Further discovery as necessary.

III. REASON FOR REQUESTING ADDITIONAL TIME TO COMPLETE DISCOVERY

The Parties aver that good cause exists under Local Rule 26-3 for the requested extension being made at this time. The Parties are requesting an extension of discovery deadlines to allow additional time so that the Parties may continue to conduct discovery, including expert witness discovery, and any additional discovery that may be necessary, and to discuss potential resolution. The Parties are actively discussing resolution. The Parties make this request for an extension not for the purposes of delay, but instead in an abundance of caution to allow sufficient time to complete the remaining discovery.

IV. PROPOSED DISCOVERY AND TRIAL SCHEDULE.

Deadline	Current Deadline	Proposed New Deadline
Amend Pleadings or Add Parties	June 28, 2023	Passed
Initial Expert Disclosures	July 28, 2023	October 26, 2023
Rebuttal Expert Disclosures	August 28, 2023	November 27, 2023
Close of Discovery	September 26, 2023	December 26, 2023
File Dispositive Motions	October 26, 2023	January 24, 2023 2024
Proposed Joint Pretrial Order	November 26, 2023	February 26, 2023 , or 30 days after the Court has formally ruled on all outstanding dispositive motions.

1 If the extension is granted, all anticipated additional discovery should be concluded within
 2 the stipulated extended deadline. The parties aver that this request for extension of discovery
 3 deadlines is made by the parties in good faith and not for the purpose of delay.

4
 5 Dated: July 7, 2023

MARATHON LAW GROUP, PLLC

6 /s/ Joseph W. Riccio

7 Joseph W. Riccio, Esq.

8 Attorneys for Plaintiff

DEBORAH GALLEGOS

9 Dated: July 7, 2023

BURGER | MEYER ^{LLP}

10 /s/ Susan E. Gillespie

11 Tabettha A. Martinez, Esq.

12 Susan E. Gillespie, Esq.

13 Attorneys for Defendant

WALMART INC.

14 **ORDER**

15 **IT IS SO ORDERED**

16 **DATED:** 12:45 pm, July 10, 2023

17 

18 **BRENDA WEKSLER**

19 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 999 Corporate Drive, Suite 220, Ladera Ranch, CA 92694.

On July 7, 2023, I served true copies of the following document(s): **STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES** on the interested parties in this action as follows:

Joe Riccio, Esq. Marathon Law Group, PLLC 2012 Hamilton Lane Las Vegas, NV 89106	Attorney for Plaintiff Deborah Gallegos T: (702) 522-1808 F: (702) 685-3625 E: joe@marathonlawgroup.com
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X **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 7, 2023, at Ladera Ranch, California.

By: 

Stephanie A. Crisp